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10 **J & J SPORTS PRODUCTIONS, INC.**

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **J & J SPORTS PRODUCTIONS, INC.**

15 **CASE NO. 3:09-cv-2533-JSW**

16 **PLAINTIFF,**

17 **STIPULATION TO CONTINUE**
18 **EARLY NEUTRAL**
19 **EVALUATION CONFERENCE**
20 **DEADLINE AND CASE**
21 **MANAGEMENT CONFERENCE;**
22 **AND ORDER (~~Proposed~~)**

23 **VS.**

24 **TEDROS KIFLIT, ET AL.**

25 **DEFENDANT.**

26 **TO THIS HONORABLE COURT:**

27 By and through their counsel, Plaintiff J & J Sports Productions, Inc., and
28 Defendant Tedros Kiflit, hereby agree, stipulate, and respectfully request that this
Honorable Court continue the Early Neutral Evaluation Conference deadline in the
above entitled action from December 17, 2009 to March 17, 2010 and respectfully
request that this Honorable Court continue the Case Management Conference,
presently set for Friday, January 8, 2010, at 1:00 p.m., to a new date of February 26,
2010, at 1:00 p.m.

STIPULATION TO CONTINUE EARLY NEUTRAL
EVALUATION CONFERENCE DEADLINE AND
CASE MANAGEMENT CONFERENCE; AND ORDER (~~Proposed~~)
CASE NO. 3:09-cv-2533-JSW
PAGE 1

1 The Parties and each of them further agree, stipulate, and respectfully request
2 this Honorable Court permit the Parties to conduct written discovery and conduct
3 depositions, in advance of any Early Neutral Evaluation Conference to take place in
4 this action.

5 This brief extension of time is mutually requested for the following reasons:

6 1. Plaintiff's counsel and defense counsel have been working
7 together, and actively discussing resolving this lawsuit short of trial.

8 2. Due to prior scheduling conflicts Plaintiff and its counsel are unable to
9 conduct and Early Neutral Evaluation by December 17, 2009.

10 3. Plaintiff's counsel's law office will be closed from December 21, 2009
11 until January 4, 2010. Defense counsel commences a trial in January 2010 and will
12 be largely unavailable in most of January.

13 4. Plaintiff and its counsel have numerous scheduling conflicts and
14 preexisting scheduling conflicts throughout January 2010.

15 5. Plaintiff's counsel and defense counsel are presently working to reschedule
16 a deposition originally set for November 30, 2009 to a mutually convenient date in
17 February 2010.

18 6. The Parties and each of them request extending discovery in order to
19 properly prepare for the Early Neutral Evaluation Conference to be conducted.

20 7. A trial date has not yet been set in the instant action. The next item
21 currently on calendar is a Case Management Conference set for Friday, January 8,
22 2010 which the Parties now request to be continued to a new date of February 26,
23 2010.

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**STIPULATION TO CONTINUE EARLY NEUTRAL
EVALUATION CONFERENCE DEADLINE AND
CASE MANAGEMENT CONFERENCE; AND ORDER (~~Proposed~~)
CASE NO. 3:09-cv-2533-JSW
PAGE 3**

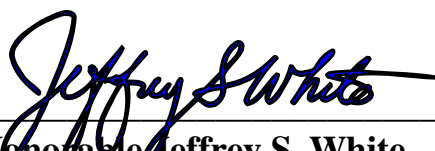
ORDER (Proposed)

IT IS HEREBY ordered that the Early Neutral Evaluation Conference deadline in the above-entitled action is hereby extended from December 17, 2009 to March 17, 2010.

IT IS HEREBY ordered that the Case Management Conference is continued from January 8, 2010, at 1:00 p.m. to a new date of February 26, 2010, at ^{1:30 p.m.}~~1:00 p.m.~~

IT IS HEREBY ordered the Parties may conduct written discovery and depositions in advance of the Early Neutral Evaluation Conference.

IT IS SO ORDERED:


Honorable Jeffrey S. White
United States District Court
Northern District of California

Dated: December 11, 2009

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STIPULATION TO CONTINUE EARLY NEUTRAL
EVALUATION CONFERENCE DEADLINE AND
CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)
CASE NO. 3:09-cv-2533-JSW
PAGE 4